

EXHIBIT B

JENNER & BLOCK LLP

Reid J. Schar (*pro hac vice*)

RSchar@jenner.com

353 N. Clark Street

Chicago, IL 60654-3456

Telephone: (312) 222-9350

Facsimile: (312) 527-0484

CLARENCE DYER & COHEN LLP

Kate Dyer (Bar No. 171891)

kdyer@clarencedyer.com

899 Ellis Street

San Francisco, CA 94109-7807

Telephone: (415) 749-1800

Facsimile: (415) 749-1694

CRAVATH, SWAINE & MOORE LLP

Kevin J. Orsini (*pro hac vice*)

korsini@cravath.com

825 Eighth Avenue

New York, NY 10019

Telephone: (212) 474-1000

Facsimile: (212) 474-3700

Attorneys for Defendant PACIFIC GAS AND
ELECTRIC COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PACIFIC GAS AND ELECTRIC
COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**DECLARATION OF [REDACTED]
IN SUPPORT OF RESPONSE TO ORDER
REQUESTING INFORMATION ON
DIXIE AND BADER FIRES**

Judge: Hon. William Alsup

DECLARATION OF [REDACTED] IN SUPPORT OF RESPONSE TO ORDER REQUESTING
INFORMATION ON DIXIE AND BADER FIRES
Case No. 14-CR-00175-WHA

I, [REDACTED] hereby declare under penalty of perjury as follows:

I make this declaration based upon personal knowledge and if called as a witness I could and would testify competently to the matters set forth herein.

I am the Senior Manager of the Distribution Planning Group at Pacific Gas and Electric Company ("PG&E").

In the course of my duties at PG&E, I have become familiar with the operation of the line reclosers used by the company, and the electronic data they transmit and store.

On July 21, 2021 I received from [REDACTED] a PG&E Distribution Line Technician, electronic data that she advises she downloaded that day from the line recloser located at the Bucks Creek Substation (the recloser for PG&E's Bucks Creek 1101 12kV Line). I also received from [REDACTED] among other pictures, a screen shot of a comparison she performed of the time shown by the clock on her laptop with the time shown by the clock on the line recloser. I thereafter provided both this data and the screen shot to [REDACTED] a PG&E Senior Distribution Engineer.

I have reviewed the declarations of both [REDACTED] and [REDACTED] that are being submitted concurrently with this declaration.

The line recloser at Bucks Creek Substation functions as a breaker. It monitors PG&E's Bucks Creek 1101 12kV Line for certain preset fault conditions and, in the event such fault conditions are detected and remain unresolved for a preset time, it will open and thereby de-energize the line. This line recloser also can be set in a mode whereby, after opening, it will automatically reclose in order to re-energize the line and determine whether the preset fault condition it had detected no longer exists. However, the downloaded data shows that this mode was disabled on May 6, 2021, and remained disabled thereafter, including on July 13, 2021. The purpose for disabling this mode is to avoid the risk during fire season that automatically reclosing and re-energizing the line might cause a fire.

In the setting operative on July 13, detection of any one of three different preset fault conditions could cause the line recloser to "trip"—that is, to open and de-energize the line. For each of these preset fault conditions, detection of current in excess of a "Minimum To Trip"

-2-

(“MTT”) amperage is a necessary condition to trip the line recloser. For a phase fault the MTT is 100 amps. For a ground fault the MTT is 50 amps. And for a sensitive ground fault the MTT is 20 amps.

In order for the line recloser to trip open for a fault condition, the fault current has to exceed the MTT threshold for the period of time defined by the applicable time characteristic curve (TCC). Under a TCC, the greater the current, the shorter the period of time required to trip open the line recloser. The applicable TCC is selected so that downstream devices will trip before the line recloser in order to limit the number of customers impacted by a fault condition.

The controller on the line recloser records various data, including oscillography data for events when a fault condition with amperage in excess of an applicable MTT is detected. The data downloaded from the line recloser includes just one such event on July 13, 2021. That event involved a phase to phase fault with amperage in excess of the applicable MTT on two of the three phases of the line. This event began at approximately 6:47:47 a.m.;¹ the event apparently lasted less than 4/100ths of a second and that was too brief to trip the line recloser.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 28th day of July, 2021, in the City of Folsom, County of Sacramento, State of California.

¹ The downloaded oscillography data in event file indicates that the fault event begins at approximately 22:57:18.4000 on July 12, 2021. However, the oscillography data uses Coordinated Universal Time, which is seven hours before Pacific Daylight Time. In addition, [REDACTED] comparison of the time reported on the clock on the recloser with the time reported on the clock on the laptop to which she downloaded the data shows that the time on the recloser clock was 50 minutes and 28.3 seconds behind the time on her laptop. Adjusting for these two facts, the time of the event recorded in the oscillography data begins is approximately 6:47:46.7 on July 13, 2021.